

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA DIVISION

**Koji IP, LLC,**  
Plaintiff,

v.

Renesas Electronics America, Inc.,  
Defendant

§  
§  
§  
§  
§  
§  
§

Case No. 3:2024-cv-03089

**DECLARATION OF SIMON SUNATORI**

I, Simon Sunatori, declare:

1. My name is **Simon Sunatori**, and I am over the age of eighteen and competent to make this declaration. The facts stated herein are within my personal knowledge. If called upon, I could and would testify competently to them.
2. I am a Canadian citizen.
3. I am a professional engineer and I have a Master of Engineering (Engineering Physics) degree from McMaster University in Hamilton, Ontario, Canada. I am a member of the Professional Engineers Ontario (PEO), and a senior member of the Institute of Electrical and Electronics Engineers (IEEE).


4. I have worked as senior integrated circuit designer for the CMOS standard cell library, as senior design system integrator for the GaAs cell library, and as UNIX systems administrator.
5. I have published articles in the Journal of Applied Physics. In 2017, I won the Grand Prize of Innovation150 Canadian Life Hacks Contest, organized by the Perimeter Institute for Theoretical Physics. In 2019, NASA Tech Briefs published my discovery "Anisotropic Electromagnetic Force Phenomena."
6. I have drafted and filed more than 60 patent applications as the sole inventor in various fields including electronics, magnetics, optics, dynamics, software, hardware, energy, safety, environment, medical, consumer products, sporting goods, fashion, etc.
7. I founded HyperInfo Canada Inc. in 1989 to pursue research and development on information processing and publishing technology as well as electromagnetic technology applications.
8. As part of pre-suit investigation, I examined US10790703. I established that Renesas Electronics's EVK Evaluation Kit and Renesas Electronics's PTX130W/PTX30W were released after US10790703's Priority dates. Then, I reviewed publicly available documents on Renesas Electronics's website, and I gathered relevant documents from Renesas Electronics's website in order to draft a claim chart that verifies infringement of certain claims of US10790703 by Renesas Electronics. I believe that the claim charts I prepared for the present litigation sufficiently show infringement by Renesas

Electronics. I submitted my claim charts to lawyers at Ramey LLP. I compared each limitation of the claims of US10790703 to the accused devices.

9. During the pendency of this lawsuit, in another lawsuit, in the Spring of 2023, Google, LLC, came forward with prior art to a related patent of Plaintiff, US10469599. I compared that prior art to US10790703 and determined that US10790703 was not anticipated or rendered obvious by Google's prior art.
10. I understand that Renesas Electronics contended that the claims of US10790703 do not read on the accused product, PTX130W/PTX30W, and that the analysis also indicates that accused product does not perform several limitations of the independent claims.
11. After discussions with lawyers at Ramey LLP, I helped develop counter-arguments to Defendant's contentions. It was and is my opinion that PTX130W/PTX30W infringed the claims of US10790703.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 30, 2024,



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Simon Sunatori, P.Eng./ing.

## APPENDIX

### **Education and Professional Development/Éducation et perfectionnement professionnel**

- **McMaster University**
  - Degree/Degré ..... Master of Engineering (Engineering Physics)
  - Location/Emplacement ..... Hamilton (Ontario) CANADA
  - Period/Période ..... 1981-06 to 1983-05
  - On-Campus Project
    - Optical and Electrical Properties of Amorphous Silicon
  - Off-Campus Project
    - Characterization and Measurement Methods in MOS Device Technology
  - Courses
    - Solid-State Electronics
    - Lasers and Laser Physics
    - Optical Instrumentation
    - Digital Devices and Systems
    - Materials Problems and Analyses in Nuclear Engineering

### **Scholarships/Bourses d'études**

- **Natural Science and Engineering Research Council Postgraduate Scholarship**
  - Period/Période ..... 1982 to 1983
- **Dr. Harry Lyman Hooker Graduate Scholarship**
  - Period/Période ..... 1982 to 1983
- **McMaster University Scholarship**
  - Period/Période ..... 1981 to 1982
- **David Sarnoff RCA Scholarship**
  - Period/Période ..... 1980 to 1981

**Utility Patents/Brevets d'utilité**

- **Magnetically-Hanging Spice Dispenser with a Continuously-Variable Hole-Size Selector**
  - Number/Numéro ..... US8381949 B2 [0068]
  - Status/Statut ..... Granted/Accordé
- **No-Glue Construction for a Magnetically-Hanging Spice Dispenser**
  - Number/Numéro ..... US8240512 B2 [0067]
  - Status/Statut ..... Granted/Accordé
- **Bisexual Magnetic Garment Closure System**
  - Number/Numéro ..... CA2686178 C [0066]
  - Status/Statut ..... Granted/Accordé
- **Method for Producing a Coreless Frozen Pizza**
  - Number/Numéro ..... CA2650085 C [0065]
  - Status/Statut ..... Granted/Accordé
- **Magnetically-Hanging Spice Dispenser with a Continuously-Variable Hole-Size Selector**
  - Number/Numéro ..... CA2639671 C [0064]
  - Status/Statut ..... Granted/Accordé
- **No-Glue Construction for a Magnetically-Hanging Spice Dispenser**
  - Number/Numéro ..... CA2639670 C [0063]
  - Status/Statut ..... Granted/Accordé
- **Drip-free Interconnect with Unisex Magnetic Connector**
  - Number/Numéro ..... CA2626157 C [0062]
  - Status/Statut ..... Granted/Accordé
- **Backpressure Regulator using Magnetic Repulsion**
  - Number/Numéro ..... CA2624740 C [0061]
  - Status/Statut ..... Granted/Accordé
- **Sealed Thermal Power Battery Charging Method and System**
  - Number/Numéro ..... CA2621752 C [0060]
  - Status/Statut ..... Granted/Accordé
- **Dual-Mode Lighting Device with Magnetically Mounted Light Diffuser**
  - Number/Numéro ..... CA2614182 C [0059]
  - Status/Statut ..... Granted/Accordé
- **Magnetically Driven Archimedes Spiral Screw Pump**
  - Number/Numéro ..... CA2602952 C [0058]
  - Status/Statut ..... Granted/Accordé
- **Vacuum Insulation Panel with Graduated Density Spacer Posts**
  - Number/Numéro ..... CA2602647 C [0057]
  - Status/Statut ..... Granted/Accordé
- **Self-Sealing Auto-Aligning Magnetically-Hanging Spice Dispenser**
  - Number/Numéro ..... US7748569 B2 [0056]
  - Status/Statut ..... Granted/Accordé
- **Self-Sealing Auto-Aligning Magnetically-Hanging Spice Dispenser**
  - Number/Numéro ..... CA2595278 C [0055]
  - Status/Statut ..... Granted/Accordé
- **Revolving-Door Transportation Method and Airlock System**
  - Number/Numéro ..... CA2593544 C [0054]
  - Status/Statut ..... Granted/Accordé
- **Toothpaste Dispenser with an Integrated Toothbrush Holder**
  - Number/Numéro ..... CA2497399 C [0053]
  - Status/Statut ..... Granted/Accordé
- **Auto-Retractable Pen with an Adjustable Cushion Effect**

- Number/Numéro ..... CA2481605 C [0052]
  - Status/Statut ..... Granted/Accordé
- **Auto-Retractable Pen with Ferromagnetic Attachment**
  - Number/Numéro ..... CA2499834 C [0051]
  - Status/Statut ..... Granted/Accordé
- **Life-Size Optical Illusion Device with Reflection-Type Holograms**
  - Number/Numéro ..... CA2474630 C [0050]
  - Status/Statut ..... Granted/Accordé
- **Holographic Display Device with a Transmission-Type Hologram**
  - Number/Numéro ..... CA2473284 C [0049]
  - Status/Statut ..... Granted/Accordé
- **Auto-Retractable Pen Mechanism with a Cushion Effect**
  - Number/Numéro ..... US6830402 B2 [0048]
  - Status/Statut ..... Granted/Accordé
- **Holographic Statue with an Auto-Switch Mechanism**
  - Number/Numéro ..... CCA2435250 C [0047]
  - Status/Statut ..... Granted/Accordé
- **Holographic Statue with a Magnetically Mounted Figurine**
  - Number/Numéro ..... CA2435245 C [0046]
  - Status/Statut ..... Granted/Accordé
- **Holographic Disc with an Embedded Sound Chip**
  - Number/Numéro ..... CA2435256 C [0045]
  - Status/Statut ..... Granted/Accordé
- **Magnetically Mounted Holographic Disc**
  - Number/Numéro ..... CA2435247 A1 [0044]
  - Status/Statut ..... Abandoned/Abandonné
- **Auto-Retractable Pen Mechanism with a Cushion Effect**
  - Number/Numéro ..... CA2429153 C [0043]
  - Status/Statut ..... Granted/Accordé
- **Magnetically Attached Wearable Pen**
  - Number/Numéro ..... CA2429157 C [0042]
  - Status/Statut ..... Granted/Accordé
- **Collapsible Beverage Locking Device**
  - Number/Numéro ..... CA2422687 C [0041]
  - Status/Statut ..... Granted/Accordé
- **3-Way Hockey Rink**
  - Number/Numéro ..... CA2422645 C [0040]
  - Status/Statut ..... Granted/Accordé
- **Erectable Hexa-Conical Beverage Container**
  - Number/Numéro ..... CA2422626 C [0039]
  - Status/Statut ..... Granted/Accordé
- **Fuel-Cell Vehicle with Ultraviolet Ammonia Cracker**
  - Number/Numéro ..... CA2403741 C [0038]
  - Status/Statut ..... Granted/Accordé
- **Flow-Through Ammonia Photodissociation Device**
  - Number/Numéro ..... CA2403694 C [0037]
  - Status/Statut ..... Granted/Accordé
- **Electromagnetic Hydrogen Generation Method and System**
  - Number/Numéro ..... CA2403738 C [0036]
  - Status/Statut ..... Granted/Accordé
- **False Nail Computer Input Device**
  - Number/Numéro ..... CA2369627 A1 [0035]
  - Status/Statut ..... Abandoned/Abandonné
- **Wearable Breast Cancer Self-Examination Model**

- Number/Numéro ..... CA2369628 C [0034]
  - Status/Statut ..... Granted/Accordé
- Bird Feeder Device with a Figurine inside a Transparent Globe
  - Number/Numéro ..... CA2349886 C [0033]
  - Status/Statut ..... Granted/Accordé
- Magnetically Hanging Spice/Sauce Dispenser System
  - Number/Numéro ..... CA2349889 C [0032]
  - Status/Statut ..... Granted/Accordé
- Adaptive Text Presentation Method and System
  - Number/Numéro ..... CA2345933 C [0031]
  - Status/Statut ..... Granted/Accordé
- Customised Text Generation Method and System
  - Number/Numéro ..... CA2346174 C [0030]
  - Status/Statut ..... Granted/Accordé
- Hierarchical Document Assembly Method and System
  - Number/Numéro ..... CA2345937 C [0029]
  - Status/Statut ..... Granted/Accordé
- Dual Electric Coffee/Tea Making Device
  - Number/Numéro ..... CA2341071 C [0028]
  - Status/Statut ..... Granted/Accordé
- Uphill Skis
  - Number/Numéro ..... CA2338834 C [0027]
  - Status/Statut ..... Granted/Accordé
- Magnetically Suspended Flywheel System
  - Number/Numéro ..... CA2327492 C [0026]
  - Status/Statut ..... Granted/Accordé
- Magnetically Erected Wind-Effect Display Device
  - Number/Numéro ..... CA2327490 C [0025]
  - Status/Statut ..... Granted/Accordé
- Eye-glass Frame with Magnetic Hinges
  - Number/Numéro ..... CA2321318 C [0024]
  - Status/Statut ..... Granted/Accordé
- Ferromagnetic Coaxial T-Junction Connector Device
  - Number/Numéro ..... CA2320683 C [0023]
  - Status/Statut ..... Granted/Accordé
- Unisex Magnetic Coaxial Connector Device
  - Number/Numéro ..... CA2320682 C [0022]
  - Status/Statut ..... Granted/Accordé
- Magnetic Coaxial Electro-Optical Connector Device
  - Number/Numéro ..... CA2320684 C [0021]
  - Status/Statut ..... Granted/Accordé
- Disc-Shaped Light-Emitting Diode Illumination Device
  - Number/Numéro ..... CA2312285 C [0020]
  - Status/Statut ..... Granted/Accordé
- Sanitary Single-Handle Water Faucet
  - Number/Numéro ..... CA2310194 C [0019]
  - Status/Statut ..... Granted/Accordé
- Hexagonal Microelectronic Integrated Circuit Chip
  - Number/Numéro ..... CA2308133 A1 [0018]
  - Status/Statut ..... Abandoned/Abandonné
- Dual Toilet Paper Dispensing Device
  - Number/Numéro ..... CA2305110 C [0017]
  - Status/Statut ..... Granted/Accordé
- Seating Furniture with Integrated Overhead Lighting

- Number/Numéro ..... CA2303470 C [0016]
  - Status/Statut ..... Granted/Accordé
- Secure Electrical Power Outlet Device
  - Number/Numéro ..... CA2292884 C [0015]
  - Status/Statut ..... Granted/Accordé
- Aircraft Black Box having Airbag
  - Number/Numéro ..... CA2292878 C [0014]
  - Status/Statut ..... Granted/Accordé
- Holographic Statue Projection Device
  - Number/Numéro ..... CA2289999 C [0013]
  - Status/Statut ..... Granted/Accordé
- Magnetic Wall Decoration Device
  - Number/Numéro ..... CA2289996 C [0012]
  - Status/Statut ..... Granted/Accordé
- Integrated Power Generation Plant and Greenhouse
  - Number/Numéro ..... CA2289991 C [0011]
  - Status/Statut ..... Granted/Accordé
- 3-Dimensional Image Display Method and System
  - Number/Numéro ..... CA2286937 C [0010]
  - Status/Statut ..... Granted/Accordé
- Life-Size Optical and Acoustical Illusion Device
  - Number/Numéro ..... CA2285822 C [0009]
  - Status/Statut ..... Granted/Accordé
- Holographic Display Device with a Paraboloidal Hologram
  - Number/Numéro ..... CA2278110 C [0008]
  - Status/Statut ..... Granted/Accordé
- Cylindrical Holographic Display Device
  - Number/Numéro ..... CA2277653 C [0007]
  - Status/Statut ..... Granted/Accordé
- Multi-Lingual Knowledge Matrix Technique
  - Number/Numéro ..... CA2260373 C [0006]
  - Status/Statut ..... Granted/Accordé
- Knowledge Matrix Method and System
  - Number/Numéro ..... CA2256266 C [0005]
  - Status/Statut ..... Granted/Accordé
- Bird Feeder Device with Multiple Concentric Perching Rings
  - Number/Numéro ..... CA2253774 C [0004]
  - Status/Statut ..... Granted/Accordé
- Topless Microwave Cooking Device
  - Number/Numéro ..... CA2253773 C [0003]
  - Status/Statut ..... Granted/Accordé
- Squirrel-Proof Bird Feeder Device
  - Number/Numéro ..... CA2196225 C [0002]
  - Status/Statut ..... Granted/Accordé
- Magnetically Levitated Axleless Wheel System
  - Number/Numéro ..... CA2190298 C [0001]
  - Status/Statut ..... Granted/Accordé
- METHOD AND STRUCTURES FOR MAKING INTEGRATED CIRCUITS
  - Number/Numéro ..... WO9111825 A1
  - Status/Statut ..... 1991-08-08
- Method for Making Integrated Circuits
  - Number/Numéro ..... US5015600 A
  - Status/Statut ..... 1991-05-14
- INTEGRATED CIRCUIT CHIP



- Number/Numéro ..... JP2835040 B2
  - Status/Statut ..... 1998-12-14
- INTEGRIERTER SCHALTUNGSCHIP MIT MEHREREN INTEGRIERTEN SCHALTUNGSZELLEN
  - Number/Numéro ..... DE3785682 T2
  - Status/Statut ..... 1993-08-19
- INTEGRATED CIRCUIT CHIP HAVING A PLURALITY OF INTEGRATED CIRCUIT CELLS
  - Number/Numéro ..... EP0232044 B1
  - Status/Statut ..... 1993-05-05
- Integrated Circuit Chip Manufacture
  - Number/Numéro ..... US4885625 A
  - Status/Statut ..... 1989-12-05
- INTEGRATED CIRCUIT CHIP MANUFACTURE
  - Number/Numéro ..... CA1238986 A
  - Status/Statut ..... 1988-07-05
- INTEGRATED CIRCUIT CHIP
  - Number/Numéro ..... JPS62248237 A
  - Status/Statut ..... 1987-10-29

## APPENDIX

• 2021-03-12: Carlos, Chamith, Perry	• Koji Yoden • US10469599 B2: "Automatic setting up of application program in portable computing device"
• 2021-03-17: Carlos, Chamith, Perry	• Koji Yoden

2022-09-23	EoU/CC-US10790703 B2: Koji Yoden - wireless power transfer v. Renesas Electronics's EVK Evaluation Kit (Claim 1) GSS
2023-12-26	Rebuttal-Koji IP, LLC v. Renesas Electronics America, Inc. Case No. 3:23-cv-05752-LJC (N.D. Cal.) GSS
2024-01-13	EoU/CC-US10790703: Koji Yoden - wireless power transfer v. Renesas Electronics's PTX130W/PTX30W (Claim 1) GSS

Litigation: Fw: Koji IP, LLC v. Renesas Electronics America, Inc. (D. Col.)	<p><a href="#">2023-07-31. Simon Dear Jeff.</a></p> <p><a href="#">Here is our reply.</a></p> <p>• <a href="#">Rebuttal-US10790703: Koji IP v. Renesas Electronics America GSS &lt;<a href="https://docs.google.com/document/u/1/d/e/2PACX-1vSMTFkfbkTEVFjGsGbqT8R1adbo2T4B2V3dcMch3KkmAZ4yM3hH8EDZdcrOfNHndpx5_9wwCz8-I7sX/pub">https://docs.google.com/document/u/1/d/e/2PACX-1vSMTFkfbkTEVFjGsGbqT8R1adbo2T4B2V3dcMch3KkmAZ4yM3hH8EDZdcrOfNHndpx5_9wwCz8-I7sX/pub</a>&gt;</a></p> <p><a href="#">2023-07-19. Simon</a>  <a href="https://docs.google.com/document/d/1kuTQW-2dx7kL4lYp7Q9HVSPRk4w6T4pPgRVxhtkTRPA/edit?usp=sharing">https://docs.google.com/document/d/1kuTQW-2dx7kL4lYp7Q9HVSPRk4w6T4pPgRVxhtkTRPA/edit?usp=sharing</a></p>
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\*Revised Koji Old Unfiled Claim  
Charts: GuRu, Ossia's Cota,  
Powercast, and Renesas  
Electronics

[2024-04-25: Chamith](#)

[OK](#)

[2024-04-23: Perry.](#)  
[these are good Simon](#)

[2024-04-22: Simon](#)

[Chamith & Perry.](#)

[The following 3 EoU/CCs were already reviewed but I updated them to make them current to our standards, so please do very quick sanity check.](#)

[EoU/CC-US10790703: Koji Yoden - wireless power transfer v. GuRu Wireless \(Claim 1\) GSS](#)

<https://docs.google.com/document/d/1dBucowCZzIXHVLR3btHO1w1weiSz-Es0PHaEwCw4OHU/edit?usp=sharing>

[EoU/CC-US10790703: Koji Yoden - wireless power transfer v. Ossia Cota \(Claim 1\) GSS](#)

<https://docs.google.com/document/d/1HusIYATlhRtASKQiNVqw0yhaExJsVLjgzE8Q7y9g1z4/edit?usp=sharing>

[EoU/CC-US10790703: Koji Yoden - wireless power transfer v. Powercast Wireless Charging Grip \(Claim 1\) GSS](#)

[https://docs.google.com/document/d/1ESkliTZ4nb9RzOwqL8NRVcp7TpJnIV60DO\\_0M2I9sSQ/edit?usp=sharing](https://docs.google.com/document/d/1ESkliTZ4nb9RzOwqL8NRVcp7TpJnIV60DO_0M2I9sSQ/edit?usp=sharing)

[2024-04-09: Simon let's make sure that these claim charts are current to our standards](#)

Litigation:Due diligence  
declaration - Ref. New filings in  
Koji IP, LLC v. Renesas  
Electronics America, Inc.:  
MOTION for Attorney Fees filed  
(cand-3:2024-cv-03089)

2024-07-08 Simon  
I have removed Carlos's changes and reverted back to Bill's changes  
ONLY.

2024-07-08 Bill  
Where are my proposed changes? this is not good and completely  
conclusory. please add in my proposed changes....

2024-07-04 Simon  
Bill,

Here is a followup to see if you are OK with Carlos's comments! If  
so, I will sign the revised declaration.

2024-06-30 Simon  
Bill,

Are you OK with Carlos's comments? If so, I will sign the revised  
declaration.

2024-06-29 Carlos  
Hi Bill, Simon,  
My only comments \*\*\*in blue\*\*\* on your point 9:  
During the pendency of this lawsuit, in another lawsuit, in the Spring  
of 2023,Google, LLC came forward with prior art to \*\*\*an un\*\*\*related  
patent of Plaintiff, US Pat. No. 10,469,599. \*\*\*The '599 patent is  
related to "Automatic setting up of application program in portable  
computing device" while the Renesas' patent-in-suit belongs to a  
separate family in a completely different field with completely different  
unrelated claims, i.e., "Smart wireless power transfer between  
devices". Nonetheless, \*\*\* I \*\*\*still\*\*\*compared that prior art to the  
'703 patent and determined that the '703 patent was not anticipated  
or rendered obvious by Google's prior art.  
Let me know your thoughts please.  
Carlos

2024-07-04 Simon  
Bill,

Here is a followup to see if you are OK with Carlos's comments! If  
so, I will sign the revised declaration.

2024-06-30 Simon  
Bill,

Are you OK with Carlos's comments? If so, I will sign the revised  
declaration.

2024-06-28 Simon  
"Simon Sunatori Declaration for Koji v. Renesas.pages" is attached to  
row "\*\*Declariation".

2024-06-28 Bill  
Hi Simon,

Thank you form the declaration. Please use these paragraphs and  
send it to me again if you agree.

[Conversations]

FW: New filings in Koji IP, LLC  
v. Renesas Electronics America,  
Inc.: REPLY (re [18] MOTION for  
(cand-3:2024-cv-03089

2024-08-17. Simon  
no technical contents whatsoever.  
e.g., "REA cites these cases because they suggest a pattern by  
Ramey LLP of filing frivolous cases to leverage the cost of litigation to  
obtain settlements notwithstanding the merits of the claims."  
A. Koji Refused to Defend the Merits of Its Own Infringement  
Contentions, Which Alone Makes This an Exceptional  
Case ..... 1  
B. Koji Does Not Contest Most of the Remaining Issues Supporting a  
Fees  
Award .....  
..... 2  
C. Whatever Pre-Suit Investigation Koji Conducted Was  
Inadequate ..... 3  
D. Filing a Precluded Action Is  
Exceptional..... 4  
E. Koji's Counsel at Ramey LLP Must Also be  
Sanctioned ..... 5  
F. Koji's Remaining Arguments Are  
Unpersuasive ..... 7

\*Litigation: FW: Koji IP v.  
Renesas Electronics America,  
Inc., Case No. 5:24-cv-03089  
(N.D. Cal.) -- correspondence

See Kim Stoke's email attachment!

2024-08-19. Simon  
• "2024.05.31 Letter to Koji IP re third case.pdf"  
. • No technical content whatsoever  
• "2024.06.12 Letter to Koji IP re contacting Renesas and follow  
up.pdf"  
. • No technical content whatsoever

2024-06-12: See new attachment and Bill's comments: "Carlos,

Please look at the technical argument sin the first letter.....

"

2024-06-09. Simon  
Lawyer's BS talks only, no technical issues to rebut.

Litigation: FW: Koji IP, LLC v.  
Renesas Electronics America,  
Inc. (N.D. Cal.) --  
correspondence

Bill: "Here is why we dismissed... no sales... and no  
infringement....."

RE: Koji IP, LLC v. Renesas  
Electronics America, Inc. (N.D.  
Cal.) -- correspondence

Tue, Jan 23, 2024: Simon see attached and forwarded email with their latest

2024-01-23: Koji

As an individual inventor, I don't personally have resource to analyze thoroughly Renesas chips and wireless powering products including Wattup, Cotta, Poercast, etc. Also, I'm not sure how specific and accurate the claim chart needs to be to be submitted to the court. So, I cannot say clearly that the claim chart is perfect for submission in the litigation or not.

I trust you as I believe you are a team of professionals as a litigator who are able to compare claim elements with the target products based on your professional analysis in view of litigation standards.

I'm happy to comment about specific questions, like one that you gave me last time about Renesas's 2012 document.

On a personal note, I'm concerned that the last claim element is sufficeintly described or implied by Renesas's PTX130W/PTX30W reference: "wherein, when the wireless power transfer system is powered by the battery power source, a determination is made whether a level of drop in a battery level of the battery power source in a given time period is below a threshold, so that activation of the wireless powering circuitry is allowed only when the level of drop is determined to be below the threshold."

To meet this limitation, the wireless power transfer system (PTX130W/PTX30W) is powered by a battery power source whose battery level is monitored for activation or deactivation of the wireless power transfer system.

2024-01-22: Simon

Koji,

The law firm is anxiously waiting for your approval.

2024-01-20: Simon

Koji,

Please approve this updated EoU/CC.

• EoU/CC-US10790703: Koji Yoden - wireless power transfer v. Renesas Electronics's PTX130W/PTX30W (Claim 1) GSS  
<<https://docs.google.com/document/d/e/2PACX-1vQpkf2PvgWoRxMZa0psZl6ky5FfskHc5gTfmm3ji2MbGnh8XczPU5h5imEg-EBHJTaY-iwkAuxaeLHL/pub>>

2024-01-19: Simon

Blessed by Chamith and Perry. -> "Yes" "No"

2024-01-19: Koji

Here is my commnet follows:

I think that the Renesas's publication in 2012 is not sufficient as prior art that makes the claimed distinguishing features obvious.

"1) Features of power transmitter IC R2A45801" seemingly suggests a safety solution, but the solution is based on temparature detection. It is likely that temperature of IC R2A45801 is detected so that wireless powering is stopped when the temperature is too high. In contrast, the claimed features include a solution based on the battery level of a battery power source powering the wireless

